

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Barry White, et al.,

Plaintiffs,

v.

Rodney Oliver, et al.,

Defendants.

Case No.:1:24-cv-07509

SUPPLEMENTAL RESPONSE TO PLAINTIFFS' MOTION FOR SANCTIONS

BY DEFENDANT RODNEY D. OLIVER (PRO SE)

Pursuant to Federal Rule of Civil Procedure 37 and the Court's inherent authority, I, Rodney D. Oliver, respectfully submit this Supplemental Response in opposition to Plaintiffs' Motion for Sanctions. This filing is intended to correct factual inaccuracies presented in Plaintiffs' motion and to clarify the status and conduct of non-party **Necole Key**, whose actions have been repeatedly mischaracterized by Plaintiffs.

I. NECESSITY OF SUPPLEMENTAL FILING

This Supplemental Response is warranted because Plaintiffs' Motion relies on representations that are materially misleading or incomplete. Plaintiffs seek extraordinary sanctions—including default judgment—based on the alleged non-compliance of a person who is neither a party to this case nor under the authority of the Court's discovery orders.

II. NON-PARTY STATUS OF MS. NECOLE KEY

Ms. Necole Key is not a named party to this litigation. She has not been served with any complaint, is not subject to any subpoena under Rule 45, and is not a representative or agent of the undersigned Defendant. She has **never been represented by my former counsel, Timothy Matson, or any other attorney on my behalf.**

Any attempts by Plaintiffs to treat Ms. Key as if she were a party—or to impute her conduct to me as a basis for sanctions—are contrary to established procedural norms and unsupported by any binding authority. See *Chambers v. NASCO, Inc.*, 501 U.S. 32, 50 (1991) (noting that sanctions must be “tailored to the specific misconduct”).

III. DOCUMENTS AT ISSUE HAVE BEEN PRODUCED OR ARE ON THE RECORD

Plaintiffs allege that I have failed to comply with discovery obligations and that Ms. Key has “withheld” responsive materials. These claims are demonstrably false:

- On July 15 and July 18, I produced relevant materials to Plaintiffs via electronic means.
- Plaintiffs have acknowledged receipt of such materials but criticize formatting (i.e., lack of Bates numbering), not substance.
- The Epic Records licensing letter, copyright records, signature audit trails, and royalty terms are all **already included in the docketed discovery submissions** (see e.g., BWT-01604 to BWT-01611).
- Any requests for these documents to be re-produced by Ms. Key are redundant and serve no valid discovery purpose.

To the extent Plaintiffs demand production from Ms. Key, they have not served her with a subpoena under **Rule 45**, which is the exclusive method for obtaining discovery from a non-party.

IV. PLAINTIFFS' CONDUCT RAISES SERIOUS CONCERNS

Communications between Plaintiffs' counsel and third-party entities (e.g., Epic Records, Greenberg Traurig) suggest a coordinated effort to **suppress Ms. Key's role** as a legitimate co-owner of the sound recording at issue. This includes:

- Monitoring or referencing her social media activity,
- Discouraging her from participating in licensing discussions,
- Misrepresenting her legal authority despite her documented role as catalog manager.

Such conduct—when coupled with the attempt to shift her independent decisions onto me—suggests that Plaintiffs are using the discovery process as a tool for harassment and not for fact-finding.

V. LEGAL STANDARD AND APPLICATION

Sanctions under Rule 37 require clear findings of willfulness, bad faith, or fault. See *Southern New England Tel. Co. v. Global NAPs Inc.*, 624 F.3d 123, 144 (2d Cir. 2010). The Court must also consider:

- Whether the noncompliance was due to inability or refusal;
- The availability of less drastic sanctions;
- Prejudice, if any, to the opposing party.

Here, there is no bad faith, no prejudice (because the documents are already in Plaintiffs' possession), and no willful noncompliance by me or any party under my control.

VI. CONCLUSION

For the foregoing reasons, I respectfully request that the Court:

1. **Deny Plaintiffs' Motion for Sanctions** in its entirety;
2. Confirm that Ms. Key is a non-party who is not subject to this Court's discovery orders;
3. Recognize that the documents in question have been produced or are otherwise available;
4. Decline to impose any adverse inference, default judgment, or cost sanction.

Respectfully submitted,

/s/**Rodney D. Oliver**

Pro Se Defendant

11074 Oso Ave

Chatsworth, CA 91311

Rodneyolivermusic@gmail.com

SUPPLEMENTAL RESPONSE TO PLAINTIFFS' MOTION FOR SANCTIONS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Barry White, et al.,
Plaintiffs,
v.
Rodney Oliver, et al.,
Defendants.

Case No.: 1:24-cv-07509

I. ALLEGATION: “Rodney Oliver has failed to respond to discovery”

Correction: I responded to Plaintiffs' discovery requests on or about July 15 and July 18, 2025, including:

- Epic licensing letter (BWT-01606),
- Copyright registration (BWT-01607–011),
- Signature and email trail from Ms. Key (BWT-01604–01605),
- Responses to interrogatories and production requests via file share.

Plaintiffs focus on formatting (e.g., missing Bates numbers), not on any actual withholding of documents.

II. ALLEGATION: “Documents have not been produced through counsel”

Correction: As of March 2025, my prior attorney, Timothy Matson, withdrew from this case. I have proceeded pro se since then. Plaintiffs' demand that materials must be re-produced “through counsel” is without legal basis under Rule 34.

III. ALLEGATION: “Necole Key is refusing to produce documents”

Correction: Ms. Necole Key is a non-party and has never been served with a subpoena under Rule 45, the only mechanism to compel discovery from non-parties. No motion to compel her compliance was filed prior to this motion for sanctions.

IV. ALLEGATION: “Plaintiffs are prejudiced by Oliver's obstruction”

Correction: Plaintiffs are in possession of the core materials they claim are missing, including licensing, royalty, and ownership records. No concrete harm has been demonstrated.

V. ALLEGATION: “Defendants are acting in bad faith”

Correction: There is no evidence of bad faith. I’ve made good faith efforts to comply. Plaintiffs failed to meet and confer under Rule 37(a)(1) before filing.

VI. ALLEGATION: “Necole Key is improperly inserting herself into the litigation”

Correction: Ms. Key is a legitimate co-owner and catalog manager. Internal emails show Plaintiffs attempted to silence her rather than address her role lawfully.

CONCLUSION

Each allegation in Plaintiffs’ motion is either legally unfounded or factually incorrect. There is no willful noncompliance, no legal duty breached by Ms. Key, and no prejudice to Plaintiffs.

I respectfully request that the Court:

1. Deny Plaintiffs’ Motion for Sanctions in full;
2. Confirm that Ms. Key, as a non-party, is not subject to court discovery orders;
3. Decline to impose any costs or adverse inferences.

Respectfully submitted,

July 25,2025

/s/ Rodney D. Oliver

Rodney D. Oliver

Pro Se Defendant

11074 Oso Ave

Chatsworth, CA 91311

Rodneyolivermusic@gmail.com

Dated: [Insert Date]

From: FinanR@gtlaw.com
To: Dorothy.Weber@musiclaw.com; SmithJ@GTLAW.com
Subject: RE: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Order
Date: Wednesday, March 26, 2025 3:27:21 PM
Attachments: [image001.png](#)

Unfortunately, it didn't tell her to keep quiet.

Rob

Robert J. Finan
Of Counsel

Greenberg Traurig, LLP
Terminus 200 | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305
T +1 678.553.2206 | F +1 678.553.2207
FinanR@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



From: Dorothy Weber <dorothy@musiclaw.com>
Sent: Wednesday, March 26, 2025 1:27 PM
To: Finan, Robert J. III (OfCnl-Atl-Ent) <FinanR@gtlaw.com>; Smith, Jeffrey (Shld-Atl-Ent) <SmithJ@GTLAW.com>
Subject: FW: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Order

EXTERNAL TO GT

Here is the Judge's order.....no conference but it looks like she is keeping them on a short leash.

I will keep you both posted.

Dorothy M. Weber, Esq.
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Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

Ricardo Rosado

From: Matson, Timothy C. <tmatson@foxrothschild.com>
Sent: Tuesday, February 25, 2025 6:22 PM
To: Dorothy Weber; FinanR@gtlaw.com; dalia.auerbach@epicrecords.com
Subject: RE: Request for Signed Agreements & Copyright Transfer Documentation – Urgent Clarification Required

Dorothy,

This is to confirm that I have directed Necole Key to stop sending correspondence to Counsel for Barry White and Epic Records.

Best regards,

Tim



Timothy C Matson
Counsel

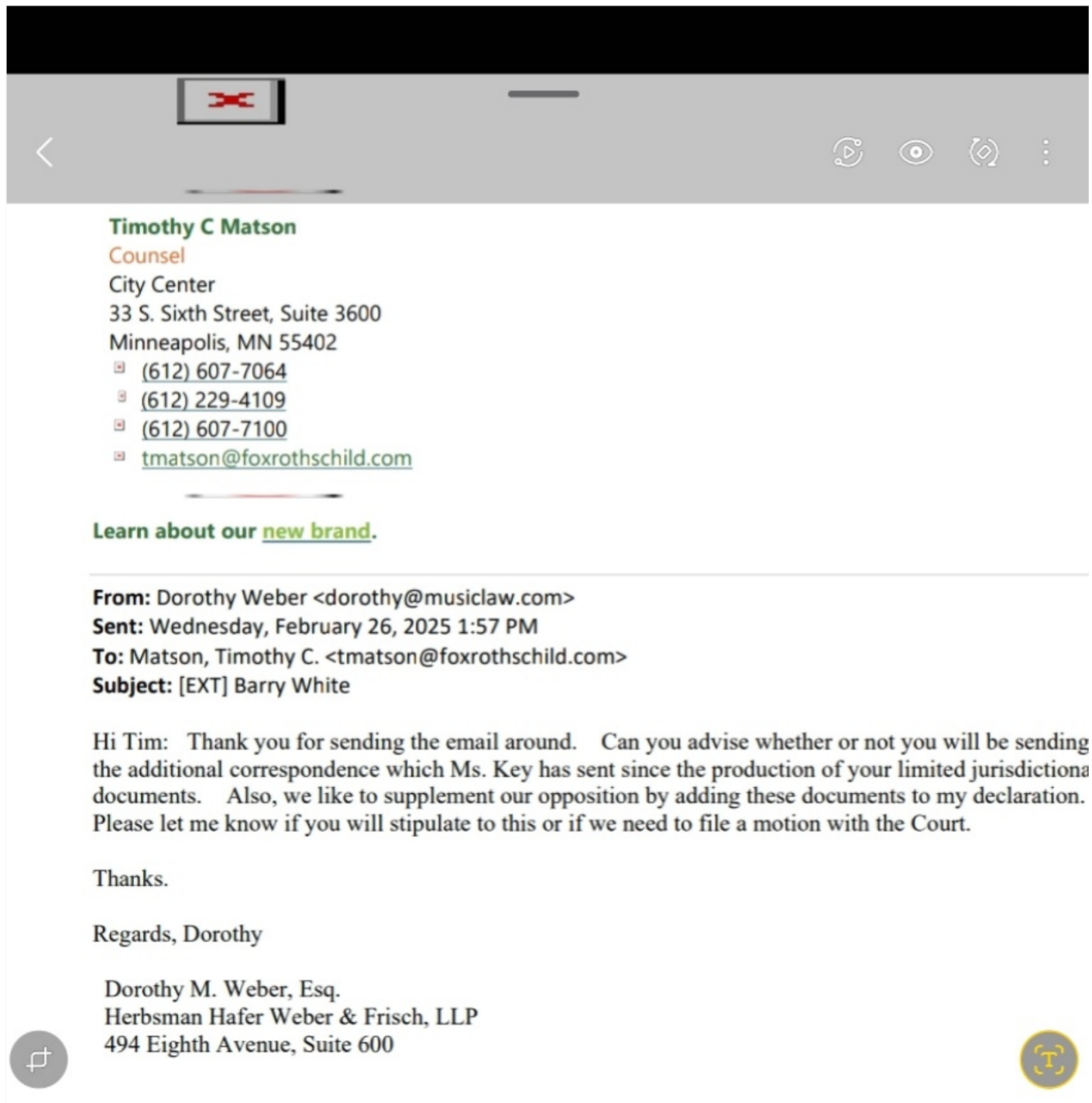
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Minneapolis, MN 55402

(612) 607-7064
 (612) 229-4109
 (612) 607-7100
 tmatson@foxrothschild.com

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From: Necole Key <necole@ladykeymanagement.com>
Sent: Tuesday, February 25, 2025 3:52 PM
To: Matson, Timothy C. <tmatson@foxrothschild.com>; Dorothy Weber <dorothy@musiclaw.com>; FinanR@gtlaw.com; dalia.auerbach@epicrecords.com; Rodney <rodneyocali@yahoo.com>
Subject: [EXT] Request for Signed Agreements & Copyright Transfer Documentation – Urgent Clarification Required

Dear Ms. Weber and Epic Records Legal Team,



From: FinanR@gtlaw.com
To: [Dorothy Weber](mailto:Dorothy.Weber@musiclaw.com); SmithJ@GTLAW.com
Cc: [Jonas Herbsman](mailto:Jonas.Herbsman@musiclaw.com)
Subject: RE: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Motion to Intervene
Date: Friday, March 21, 2025 11:33:37 AM
Attachments: [image001.png](#)
[Dkt. 47 - Necoie Key's Motion to Intervene as an individual.pdf](#)

Thank you Dorothy.

Rob

Robert J. Finan
Of Counsel

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From: Dorothy Weber <dorothy@musiclaw.com>
Sent: Friday, March 21, 2025 11:22 AM
To: Finan, Robert J. III (OfCnl-Atl-Ent) <FinanR@gtlaw.com>; Smith, Jeffrey (Shld-Atl-Ent) <SmithJ@GTLAW.com>
Cc: Jonas Herbsman <jonas@musiclaw.com>
Subject: FW: Activity in Case 1:24-cv-07509-DLC The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al Motion to Intervene

EXTERNAL TO GT

Another round just filed.

Dorothy M. Weber, Esq.
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E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: [Dorothy Weber](#)
To: [FinanR@gtlaw.com](#); [Ricardo Rosado](#); [SmithJ@GTLAW.com](#)
Cc: [Jonas Herbsman](#)
Subject: RE: CERTIFICATE OF SERVICE Case No.: 24cv7509 (DLC)/JOINT DEFENSE
Date: Monday, March 24, 2025 4:20:00 PM
Attachments: [image001.png](#)

He did previously file a notice of appearance. The good news is that he agrees to personal jurisdiction. He also says he supports whatever Key is doing. I have a draft letter to the Court which I will send you before the end of the day for your thoughts and/or comments.

By separate email, I am going to send you some of her social media posts about filing criminal charges....

Dorothy M. Weber, Esq.
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E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: [FinanR@gtlaw.com](#) <FinanR@gtlaw.com>
Sent: Monday, March 24, 2025 4:16 PM
To: [Ricardo Rosado](#) <ricardo@musiclaw.com>; [SmithJ@GTLAW.com](#)
Cc: [Dorothy Weber](#) <dorothy@musiclaw.com>
Subject: RE: CERTIFICATE OF SERVICE Case No.: 24cv7509 (DLC)

Has Rodney Oliver ever submitted a motion to represent himself pro se?

Robert J. Finan
Of Counsel

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From: [Ricardo Rosado](#) <ricardo@musiclaw.com>
Sent: Monday, March 24, 2025 3:50 PM
To: [Finan, Robert J. III \(OfCnl-Atl-Ent\)](#) <FinanR@gtlaw.com>; [Smith, Jeffrey \(Shld-Atl-Ent\)](#) <SmithJ@GTLAW.com>
Cc: [Dorothy Weber](#) <dorothy@musiclaw.com>

From: [Dorothy Weber](#)
To: FinanR@gtlaw.com; [Jeffrey M. Smith \(smithj@gtlaw.com\)](mailto:Jeffrey M. Smith (smithj@gtlaw.com))
Subject: FW: Final Cease and Desist – Misuse of Communications, Misrepresentation
Date: Wednesday, March 26, 2025 3:35:00 PM

It didn't keep her quiet for sure....her latest missive to me!

Dorothy M. Weber, Esq.
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New York, NY 10001
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Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Necole Key <necole@ladykeymanagement.com>
Sent: Wednesday, March 26, 2025 3:30 PM
To: Dorothy Weber <dorothy@musiclaw.com>
Subject: Final Cease and Desist – Misuse of Communications, Misrepresentation Notice

Dear Ms. Weber,

I am writing to issue a final cease and desist notice regarding the personal and professional communications, and the false and deceptive conduct made by you, Epic and your client, The Barry White Foundation.

Ricardo Rosado

From: Dorothy Weber
Sent: Tuesday, February 25, 2025 2:08 PM
To: Matson, Timothy C.
Subject: FW: Response to Improper Demand for Communications
Attachments: Letter to Tim Matson 2.24.2025-C.PDF

Importance: High

Dear Tim: Please advise Ms. Keys to refrain from communicating with me directly. Please confirm immediately.

Very truly yours,

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
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New York, NY 10001
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Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Necole Key <necole@ladykeymanagement.com>
Sent: Tuesday, February 25, 2025 2:01 PM
To: Dorothy Weber <dorothy@musiclaw.com>; Matson, Timothy C. <tmatson@foxrothschild.com>; Rodney <rodneyocali@yahoo.com>
Subject: Response to Improper Demand for Communications

Dear Ms. Weber,

This letter serves as a formal response to your request for communications involving myself, Necole Key. After reviewing the nature of your request, it is clear that your demand lacks a valid legal basis.

1. Attorney-Client Privilege & Work Product Protection

I, Necole Key serves as Rodney Oliver's rights manager and has been involved in privileged discussions regarding legal strategy, negotiations, and case management. Any communications containing legal advice or strategy discussions with counsel are protected under attorney-client privilege and the work product doctrine. These privileges prevent disclosure of such information.

As you are aware, privileged communications cannot be compelled unless an express waiver is granted by the privilege holder. No such waiver has been given.

2. Lack of Proper Legal Authority

Your request for my, Necole Key's communications is not supported by any valid legal process:
- No court order or valid subpoena has been issued.

From: [Dorothy Weber](#)
To: [FinanR@gtlaw.com](#); [Jeffrey M. Smith \(smithj@gtlaw.com\)](#)
Subject: FW: Final Cease and Desist – Misuse of Communications, Misrepresentation
Date: Wednesday, March 26, 2025 3:35:00 PM

It didn't keep her quiet for sure....her latest missive to me!

Dorothy M. Weber, Esq.
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494 Eighth Avenue, Suite 600
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Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Necole Key <necole@ladykeymanagement.com>
Sent: Wednesday, March 26, 2025 3:30 PM
To: Dorothy Weber <dorothy@musiclaw.com>
Subject: Final Cease and Desist – Misuse of Communications, Misrepresentation Notice

Dear Ms. Weber,

I am writing to issue a final cease and desist notice regarding the personal and professional communications, and the false and deceptive conduct made by you, Epic and your client, The Barry White Foundation.

Ricardo Rosado

From: Dorothy Weber
Sent: Tuesday, March 18, 2025 11:51 AM
To: Matson, Timothy C.
Subject: Barry White

Hi Tim: It appears that there is an additional agreement that was not produced in limited discovery which is a master agreement referenced by Ms. Key in her papers. I know that you are in the place where you have not yet been discharged but I would appreciate a copy of that agreement since we believe that should have been produced.

Written with the usual reservations....

Best, Dorothy

Dorothy M. Weber, Esq.
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Fax: (212) 956-6471
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<http://www.linkedin.com/in/dorothymweberesq/>

Ricardo Rosado

From: Dorothy Weber
Sent: Thursday, February 27, 2025 1:44 PM
To: Matson, Timothy C.
Subject: RE: Barry White

Thanks.

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
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New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Matson, Timothy C. <tmatson@foxrothschild.com>
Sent: Thursday, February 27, 2025 1:40 PM
To: Dorothy Weber <dorothy@musiclaw.com>
Subject: RE: Barry White

Dorothy, I have requested the correspondence you refer to and will revert back to you once I review.

Best,

Tim



Timothy C Matson
Counsel

City Center
33 S. Sixth Street, Suite 3600
Minneapolis, MN 55402

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📠 (612) 229-4109
📠 (612) 607-7100
✉ tmatson@foxrothschild.com

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1

BWT-001173

Ricardo Rosado

From: Dorothy Weber
Sent: Wednesday, February 26, 2025 2:57 PM
To: Matson, Timothy C.
Subject: Barry White

Hi Tim: Thank you for sending the email around. Can you advise whether or not you will be sending the additional correspondence which Ms. Key has sent since the production of your limited jurisdictional documents. Also, like to supplement our opposition by adding these documents to my declaration. Please let me know if you will stipulate to this or if we need to file a motion with the Court.

Thanks.

Regards, Dorothy

Dorothy M. Weber, Esq.
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Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

Ricardo Rosado

From: Matson, Timothy C. <tmatson@foxrothschild.com>
Sent: Tuesday, February 25, 2025 6:22 PM
To: Dorothy Weber; FinanR@gtlaw.com; dalia.auerbach@epicrecords.com
Subject: RE: Request for Signed Agreements & Copyright Transfer Documentation – Urgent Clarification Required

Dorothy,

This is to confirm that I have directed Necole Key to stop sending correspondence to Counsel for Barry White and Epic Records.

Best regards,

Tim



Timothy C Matson
 Counsel

City Center
 33 S. Sixth Street, Suite 3600
 Minneapolis, MN 55402

☎ (612) 607-7064

☎ (612) 229-4109

☎ (612) 607-7100

✉ tmatson@foxrothschild.com

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From: Necole Key <necole@ladykeymanagement.com>
Sent: Tuesday, February 25, 2025 3:52 PM
To: Matson, Timothy C. <tmatson@foxrothschild.com>; Dorothy Weber <dorothy@musiclaw.com>; FinanR@gtlaw.com
 dalia.auerbach@epicrecords.com; Rodney <rodneycali@yahoo.com>
Subject: [EXT] Request for Signed Agreements & Copyright Transfer Documentation – Urgent Clarification Required

Dear Ms. Weber and Epic Records Legal Team,

1

BWT -001175

As Rodney O's Rights Manager, I have the obligation to protect his rights and interests in all matters concerning his intellectual property, licensing agreements, and financial entitlements. To fulfill this duty effectively, I require full clarity and transparency from all parties involved.

1. Request for Signed Agreements from Epic Records

Epic Records has asserted rights over the master recording and composition for Like That (including the Kendrick Lamar verse) and the use of Everlasting Bass. However, no fully executed agreements have been provided to confirm Epic's legal authority over these rights.

Accordingly, I am requesting the immediate production of the following:

- A fully executed and signed agreement proving Epic Records obtained a valid license for both the master recording and composition incorporating Everlasting Bass.
- Proof of clearance for Kendrick Lamar's verse, confirming that all relevant stakeholders approved its inclusion.
- Any correspondence or documentation that supports Epic's claim of legal authority over these rights, including revenue allocations.

Failure to provide these agreements within three (3) business days will necessitate legal action to ensure Rodney O's rights are properly protected.

Ricardo Rosado

From: Matson, Timothy C. <tmatson@foxrothschild.com>
Sent: Wednesday, December 18, 2024 7:21 PM
To: Dorothy Weber
Cc: Langer, Philip Z.; Rogers, Leron E.; Acevedo, Antonia M.
Subject: Barry White Estate v. Oliver et al.
Attachments: Letter re_ Plaintiff's Request for Jurisdictional Discovery (12-18-24)(166160320.1).pdf
Letter Acknowledgment.pdf; Emails - Like That.pdf

Dorothy,

Attached are responses and documents pertaining to your request for informal jurisdictional discovery.

Best regards,

Tim



Timothy C Matson
Counsel

City Center
33 S. Sixth Street, Suite 3600
Minneapolis, MN 55402

 (612) 607-7064
 (612) 229-4109
 (612) 607-7100
 tmatson@foxrothschild.com

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From: Dorothy Weber <dorothy@musiclaw.com>
Sent: Wednesday, December 18, 2024 11:40 AM
To: Matson, Timothy C. <tmatson@foxrothschild.com>
Subject: RE: [EXT]

Thanks Tim

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001

1

BWT -001190



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TIMOTHY C. MATSON
Direct No: 612.607.7064
Email: TMatson@FoxRothschild.com

1190 / 1316

December 18, 2024

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP

Ricardo Rosado

From: Dorothy Weber
Sent: Wednesday, February 19, 2025 7:34 PM
To: Matson, Timothy C.
Subject: FW: Barry White

Sorry I was rushing before!

I'm going to blame it on the cold but I think you are in worse shape on that front.
Can you please find out what she is doing because I would hope to ratchet things down not up during the pendency of the litigation---which I believe is your intent as well.

Regards, Dorothy

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

From: Ricardo Rosado <ricardo@musiclaw.com> **On Behalf Of** Dorothy Weber
Sent: Wednesday, February 19, 2025 6:19 PM
To: Matson, Timothy C. <tmatson@foxrothschild.com>
Cc: Dorothy Weber <dorothy@musiclaw.com>; Judy <jameyers68@gmail.com>; Rakhil Kalantarova <rakhil@musiclaw.com>
Subject: Barry White

Hi Tim: We are going to attach a copy of the agreement for the sample as part of our opposition to the motion to dismiss. I also understand that Ms. Key has communicated directly with third parties in connection with this litigation and we ask that you advise her that these communications are all part of our litigation hold and will be subject to discovery.

Sincerely,

Dorothy M. Weber, Esq.
Herbsman Hafer Weber & Frisch, LLP
494 Eighth Avenue, Suite 600
New York, NY 10001
Direct Dial: (646) 795-6068
Fax: (212) 956-6471
E-Mail: dorothy@musiclaw.com
<http://www.linkedin.com/in/dorothymweberesq/>

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Barry White Family Trust U/A/D December 19, 1980,
Plaintiff,

v.

Rodney David Oliver,
Defendant.

Case No. 1:24-cv-07509 (DLC)

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2025, I caused a true and correct copy of the attached

SUPPLEMENTAL RESPONSE TO PLAINTIFFS' MOTION FOR SANCTIONS

to be served via email upon the following:

Dorothy M. Weber, Esq.
Shukat Arrow Hafer Weber & Herbsman, LLP
494 8th Avenue, Suite 600
New York, NY 10001
Email: dorothy@musiclaw.com

Judith Ann Meyers, Pro Se
Barry White Family Trust U/A/D December 19, 1980
Email: jameyers68@gmail.com

Joe Cooley, Pro Se
248 E 157th Street
Gardena, CA 90248
Email: cooleyjoe011@gmail.com

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Respectfully submitted,

/s/ Rodney David Oliver
Rodney David Oliver (Pro Se Defendant)
11074 Oso Avenue
Chatsworth, CA 91311
rodneyolivermusic@gmail.com

Dated: July 25 , 2025